

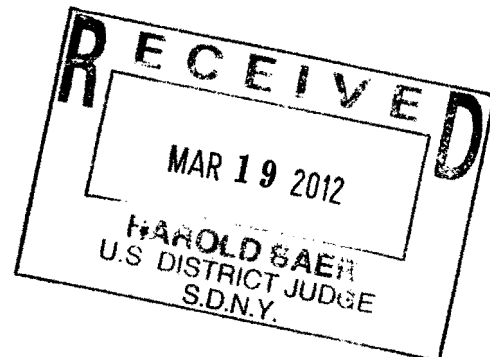
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March 16, 2012

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BY HAND

Honorable Harold Baer, Jr.
United States District Judge
United States District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007



Re: *United States v. Goldberg, et al.*, 10 Cr. 654 (HB)

Dear Judge Baer:

We represent Steven Goldberg in the above matter. Our response to Daniel Naeh's motion to quash two subpoenas *duces tecum* is due today. Because the filing of our memorandum of law and exhibits will necessarily disclose information subject to the Protective Order filed in this case to the public and the media, we respectfully request permission to file our memorandum of law and exhibits under seal on Monday, March 19. Courtesy copies of Mr. Goldberg's memorandum of law and exhibits are enclosed, and a copy of the same will be delivered to Susan Hoffinger, counsel for Mr. Naeh, today.

Respectfully submitted,

Daniel M. Gitner

So Ordered:

Hon. Harold Baer, Jr.
United States District Judge

Encl.